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COMMENT

May 4, 2000

Jean Webb Secretary Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581 Fax (202) 418 5521

Dear Ms, Webb:

Dyer Cotton Company supports the proposed change in the rules of the New York Cotton Exchange No.2 Contract that would prohibit the inclusion in the certificated stocks cotton pledged as collateral to the Commodity Credit Corporation. We support the important change in order to assure that the certificated stocks will reflect the actual number of bales being tendered for possible delivery on the contract. Lacking approval of the proposed rule change, the No 2 contract will preclude farmers, cooperatives, merchants, and mills from an accurate price discovery mechanism.

Sincerely

President

Dyer Cotton Company

C.F.T.C.

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